

District Judge Richard A. Jones

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

E.L.A. and O.L.C.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No. C20-1524-RAJ

SECOND STIPULATED MOTION FOR
ORDER OF 60-DAY ABEYANCE

NOTE ON MOTION CALENDAR:
SEPTEMBER 7, 2021

The Parties, by and through the undersigned counsel, jointly stipulate and move the Court for a second 60-day abeyance of this matter. On July 9, 2021, the Court granted the parties' first request for a 60-day abeyance. Dkt. No. 26.

Since then, the United States and the group of counsel coordinating negotiations on behalf of plaintiffs and claimants ("Coordinating Counsel") continue to make significant progress in their effort to settle the district court cases nationwide and pending administrative tort claims arising from family separations at the U.S./Mexico border that occurred during the prior administration. During the current stay period, the United States and Coordinating Counsel continued to meet frequently and narrowed their differences on important elements of the settlement framework. However, due to the scale and complexity of the settlement effort, additional time is needed to reach a final agreement. To facilitate these ongoing discussions, the

1 parties jointly request that this action, including all proceedings and case deadlines, be held in
2 abeyance for an additional 60 days.

3 Therefore, the parties stipulate and agree that good cause exists for an Order:

4 1. Holding this matter in abeyance for 60 days until November 8, 2021;

5 2. That, if this matter is not settled by November 8, 2021, the parties will jointly
6 update the Court and either seek an additional abeyance or continue the litigation.

7 Respectfully submitted,

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21 Attorneys for the United States

ORDER

IT IS SO ORDERED.

Dated this _____ day of _____, 2021.

The Honorable Richard A. Jones
United States District Judge